

FILED

August 07, 2024

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy Clerk

**UNITED STATES OF AMERICA,
Plaintiff,**

v.

**MARTIN ADRIAN MARTINEZ,
Defendant.**

**Case No: EP:24-CR-01724-
DCG(1)**

**UNITED STATES' MOTION TO DETAIN DEFENDANT WITHOUT
BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant was arrested for a violation of Title 18, United States Code, Section 924(a)(1)(A), *Causing a Federal Firearms Dealer to Maintain a False Record*; for a violation of Title 18, United States Code, Section 922(a)(6), *False Statement in Acquisition of a Firearm*; for a violation of Title 18, United States Code, Section 932, *Straw Purchasing Firearms*; and for a violation of Title 18, United States Code, Section 933, *Trafficking in Firearms*.
2. The Defendant is a United States citizen, however, Defendant has ties to Mexico, therefore, presents a high risk of fleeing to avoid prosecution.
3. The Defendant has a prior criminal history.
4. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.
5. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

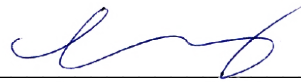
The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

By:



SHUHAO "SEAN" WANG
Assistant U.S. Attorney
New Mexico State Bar #149505
700 E. San Antonio, Suite 200
El Paso, Texas 79901
(915) 534-6884